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July 10, 2024

**VIA ECF**

Hon. Dale E. Ho  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**Re:   Barrett v. The Arena Group Holdings, Inc., et al.  
Civil No. 1:24-cv-00673-DEH  
Joint Letter-Motion to Stay Proceedings**

Dear Judge Ho:

Pursuant to Your Honor's Individual Practices Rule 2(e), Plaintiff Henry Robertson Barrett ("Barrett"), Defendant The Arena Group Holdings, Inc. ("Arena Group"), and Defendant Manoj Bhargava ("Bhargava") (collectively, the "Parties"), submit the following Joint Motion to Stay Proceedings in the above-captioned Action (the "Action"). **All Parties have joined and consent to this Letter-Motion.**

In support of this Joint Letter-Motion, the Parties state as follows:

1. On January 30, 2024, Barrett filed this Action with this Honorable Court.
2. On February 6, 2024, Arena Group was served with Barrett's Complaint.
3. On February 12, 2024, Bhargava was served with Barrett's Complaint.
4. On May 7, 2024, the Court issued its Civil Case Management Plan and Scheduling

Order ("Scheduling Order"), ECF No. 43.

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5. Pursuant to the Scheduling Order, on June 7, 2024, all Parties served their initial discovery requests.

6. Pursuant to the Scheduling Order, the Parties' initial deadline to serve requests for admission was July 7, 2024.

7. The Parties mutually agreed to a two-week extension of time to serve requests for admission and discovery responses in order to accommodate vacation schedules. Unless the deadlines are otherwise stayed or extended, the Parties' requests for admission and responses to interrogatories and requests for production are due on July 22, 2024.

8. Defendants Arena Group and Bhargava have also filed motions to dismiss various claims raised in Plaintiff's original Complaint, which motions are currently pending before this Court.

9. On June 27, 2024, Plaintiff filed his First Amended Complaint adding a new tortious interference claim against Bhargava. Bhargava's deadline to answer or file a motion to dismiss the new tortious interference claim is July 18, 2024.

10. The Parties request this stay of litigation to fully explore the possibility of an early resolution to this matter and to avoid incurring additional fees and costs during the course of settlement negotiations. The Parties believe that this stay of litigation would provide the best chance of settlement, conserve the maximum amount of funds available for a potential settlement, and allow the Parties to focus their time and efforts over the next several weeks on settlement discussions. The Parties believe that a stay of litigation is in all Parties' best interests and would also conserve the Court's resources.

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11. The Parties jointly request this stay of all case deadlines including, but not limited to, the discovery-related deadlines and Bhargava's answer or motion to dismiss, pending the completion of the Parties' settlement negotiations.

12. The Parties propose providing a status update to the Court regarding the status of settlement negotiations no later than August 6, 2024.

13. This is the Parties' first Joint Letter-Motion to Stay Proceedings. The Parties have not previously requested any extensions or adjournments from the Court with respect to discovery.

14. The Parties represent that there is good cause shown, and this request is not made for the purpose of delay.

For the foregoing reasons, the Parties respectfully request that this Court grant their Joint Letter-Motion to Stay Proceedings and request that the case be stayed to allow the Parties to fully explore the possibility of an early resolution of this matter.

Date: July 10, 2024

Respectfully submitted,

/s/ Kerstin Miller

Kerstin M. Miller, Esq. (*Admitted Pro Hac Vice*)  
Adam M. Meehan, Esq. (*Admitted Pro Hac Vice*)  
*Counsel for Defendant The Arena Group Holdings, Inc.*

/s/ Eric J. Pelton

Eric J. Pelton, Esq. (*Admitted Pro Hac Vice*)  
*Counsel for Defendant Manoj Bhargava*

/s/ Joshua A. Hawks-Ladds

Joshua A. Hawks-Ladds, Esq. (JH3306)  
*Counsel for Plaintiff H. Robertson Barrett*

cc: All Counsel of Record via ECF electronic filing